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*Counsel for Movant Cameron Wyatt
and Proposed Lead Counsel for the
Class*

[Additional Counsel on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TREY GREENE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ZAC PRINCE, FLORI MARQUEZ,
TONY LAURA, JENNIFER HILL
and GEMINI TRADING, LLC,

Defendants.

Case No. 2:23-cv-01165-KM-LDW

NOTICE OF MOTION OF
CAMERON WYATT FOR
APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION
OF LEAD COUNSEL

Motion Date: June 5, 2023

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Cameron Wyatt (“Wyatt”), by and through his counsel, will and does hereby move this Court, pursuant to Section 27(a)(3) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3), and Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for an Order: (1) appointing Wyatt as Lead Plaintiff on behalf of a class consisting of all persons and entities other than the above-captioned defendants who invested in a BlockFi, Inc. Interest Account between March 4, 2019 and November 28, 2022, both dates inclusive (the “Class”); and (2) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

Dated: May 1, 2023

Respectfully submitted,

POMERANTZ LLP

/s/ Thomas H. Przybylowski

Thomas H. Przybylowski

Jeremy A. Lieberman

(*pro hac vice* application forthcoming)

J. Alexander Hood II

(*pro hac vice* application forthcoming)

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